

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

CUSTOMS AND TAX ADMINISTRATION OF
THE KINGDOM OF DENMARK
(SKATTEFORVALTNINGEN) TAX REFUND
SCHEME LITIGATION

This document relates to 1:18-CV-05053-LAK.

MASTER DOCKET

Case No. 1:18-MD-02865-LAK

**NOTICE OF THE GOLDSTEIN LAW GROUP PC 401(K) PROFIT SHARING
PLAN'S AND SHELDON GOLDSTEIN'S
MOTION TO DISMISS AMENDED COUNTERCLAIM**

PLEASE TAKE NOTICE that, upon the accompanying May 18, 2020 Memorandum of Law and May 18, 2020 Declaration of Kari Parks, with all exhibits thereto, Defendants-Third-Party Plaintiffs-Third-Party Counterclaim Defendants The Goldstein Law Group PC 401(K) Profit Sharing Plan and Sheldon Goldstein (together, the **"Goldstein Parties"**), by their undersigned attorneys, will move the Court before the Honorable Lewis A. Kaplan at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, Courtroom 21B, at a date and time to be determined by the Court, for an order pursuant to Rules 12(b)(1) and / or 12(b)(6) of the Federal Rules of Civil Procedure dismissing Third-Party Defendant-Third-Party Counterclaim Plaintiff ED&F Man Capital Markets, Ltd's Counterclaim against the Goldstein Parties with prejudice, and for such other and further relief as the Court deems just and proper.

The Goldstein Parties respectfully request that the Court hold oral argument on this motion.

Dated: May 18, 2020
New York, New York

GUSERAE KAPLAN NUSBAUM PLLC

By: /s/ Martin H. Kaplan

Martin H. Kaplan

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